

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 17-20489

Honorable Terrence G. Berg

v.

OCEAN FRANCIS,

Defendant.

/

**MOTION FOR TRAVEL AND
SUBSISTENCE AT GOVERNMENT EXPENSE**

*Brief in Support
Certificate of Service
Proposed Order*

NOW COMES Defendant, Ocean Francis, by her counsel, Victor Mansour, panel attorney, and moves this Honorable Court pursuant to 18 U.S.C. §4285, for an Order directing the U.S. Marshal to furnish the Defendant fare for transportation to the Eastern District of Michigan. The Defendant files a supporting Brief and further states as follows:

1. The Defendant is charged by way of Sixth Superseding Indictment with Conspiracy to Distribute Controlled Substance 21 U.S.C § 846.
2. The Defendant, with the consent of the Assistant United States Attorney, will Self Surrender on June 20, 2019 in the Eastern District of Michigan Southern Division.
3. Victor Mansour was appointed to represent the Defendant prior to the Sixth Superseding Indictment.
4. Defendant resides in Los Angeles, California.

5. The Defendant is financially unable to provide the necessary transportation to appear in the Eastern District of Michigan.
6. The interests of justice would be served by ordering the U.S. Marshal to pay for one-way transportation and subsistence expenses.
7. Pursuant to LCR 7.1, concurrence was sought, and Assistant United States Attorney Andrea Hutting takes no position in the requested relief.

WHEREFORE, the Defendant respectfully requests this Honorable Court to enter an Order to that effect.

Respectfully submitted,

/s/ Victor Mansour

MANSOUR LAW, PC
Victor Mansour (P71767)
Attorney for the Defendant
32121 Woodward Avenue, Ste PH
Royal Oak, MI 48073
248-579-9800
248-575-4470 (Fax)

June 7, 2019

**UNITED STATES DISTRICT COURT
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Defendant.

**BRIEF IN SUPPORT OF
MOTION FOR TRAVEL
AND SUBSISTENCE EXPENSES**

This court has authority to order that Defendant's fare and subsistence expenses be paid pursuant to 18 U.S.C. §4285. That section provides:

Any judge or magistrate of the United States, when ordering a person released under chapter 207 on a condition of his subsequent appearance before that court, any division of that court, or any court of the United States in another judicial district in which criminal proceedings are pending, may when the interests of justice would be served thereby and the United States judge or magistrate is satisfied, after appropriate inquiry, that the Defendant is financially unable to provide the necessary transportation to appear before the required court on his own, direct the United States marshal to arrange for that person's means of noncustodial transportation or furnish the fare for such transportation to the place where his appearance is required, and in addition may direct the United State marshal to furnish that person with an amount of money for subsistence expenses to his destination, not to exceed the amount authorizes as a per diem allowance for travel under section 5702(a) of title 5, Unites States Code. When so ordered, such expenses shall be paid by the marshal out of funds authorized by the Attorney General for such expenses.

Respectfully submitted,

/s/ Victor Mansour
MANSOUR LAW, PC
Victor Mansour (P71767)
Attorney for the Defendant
32121 Woodward Avenue, Ste PH
Royal Oak, MI 48073
248-579-9800
248-575-4470 (Fax)

June 7, 2019

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

Respectfully submitted,

/s/ Victor Mansour
MANSOUR LAW, PC
Victor Mansour (P71767)
Attorney for the Defendant
32121 Woodward Avenue, Ste PH
Royal Oak, MI 48073
248-579-9800
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June 7, 2019

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ORDER FOR NON-CUSTODIAL TRAVEL EXPENSES

Upon the application of Defendant, Ocean Francis, for Travel Expenses, pursuant to 18 U.S.C. § 4285, and the Court being apprised of Defendant's indigence and the Government having no objections;

IT IS HEREBY ORDERED that the U.S. Marshal furnish Defendant Ocean Francis with one-way, non-custodial transportation from Los Angeles, California to Detroit, Michigan for purposes of satisfying her Self Surrender date of June 20, 2019, before 10:00 a.m.

SO ORDERED

/s/Terrence G. Berg

TERRENCE G. BERG

UNITED STATES DISTRICT JUDGE

Dated: June 10, 2019